

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY
CAMDEN VICINAGE**

**IN RE: VALSARTAN, LOSARTAN,
AND IRBESARTAN PRODUCTS
LIABILITY LITIGATION**

MDL No. 2875

Honorable Robert B. Kugler,
District Court Judge

This Document Relates to All Actions

SPECIAL MASTER ORDER NO.

THE SPECIAL MASTER HAVING CONSIDERED the letter of June 29, 2023 from Attorney Kara Kapke reporting that the Retail Pharmacy Defendants, without waiving any objections and without prejudice to their ability to seek relief from this schedule if there are unforeseen difficulties or delays, and Plaintiffs, have agreed to a schedule for discovery in this case for outstanding valsartan, and all losartan and irbesartan discovery; requesting entry of an order for that schedule; and finding that the agreed-upon schedule is acceptable, IT IS HEREBY ORDERED, this ____ day of _____, 2023, that:

1. The Retail Pharmacy Defendants and Plaintiffs shall negotiate and finalize all outstanding Requests for Production by July 19, 2023. If they cannot reach agreement by July 19, 2023, the Retail Pharmacy Defendants and Plaintiffs shall each

file letter briefs by July 21, 2023. If the parties file those letter briefs, the Court will hear argument on those issues *either* at the July 25, 2023 Case Management Conference, or, if that conference moves to accommodate a pending request from manufacturers' counsel, via Zoom within seven days of July 21, 2023.

2. The Retail Pharmacy Defendants and Plaintiffs shall negotiate and finalize (1) the identity of custodians, and (2) search terms for custodial discovery by August 10, 2023. If they cannot reach agreement by August 10, 2023, the Retail Pharmacy Defendants and Plaintiffs shall each file letter briefs by August 17, 2023. If the parties file those letter briefs, the Court will set argument on those issues via Zoom within seven days of August 17, 2023.

3. The Retail Pharmacy Defendants and Plaintiffs shall negotiate and finalize topics for 30(b)(6) depositions by September 29, 2023. If they cannot reach agreement by September 29, 2023, the Retail Pharmacy Defendants and Plaintiffs shall each file letter briefs by October 6, 2023. If the parties file those letter briefs, the Court will set argument on those issues via Zoom within seven days of October 6, 2023.

4. The Retail Pharmacy Defendants shall serve written responses to the Requests for Production by October 13, 2023.

5. The Retail Pharmacy Defendants shall substantially complete their document production by January 10, 2024.

6. The Retail Pharmacy Defendants and Plaintiffs shall negotiate and finalize the identities of the deponents for each Retail Pharmacy Defendant by January 24,

2024. If they cannot reach agreement by January 24, 2024, the Retail Pharmacy Defendants and Plaintiffs shall each file letter briefs by January 31, 2024. If the parties file those letter briefs, the Court will set argument on those issues via Zoom within seven days of January 31, 2024.

7. The Retail Pharmacy Defendants and Plaintiffs shall complete all depositions of Retail Pharmacy Defendants, including 30(b)(6) depositions, by March 11, 2024.

Hon. Thomas I. Vanaskie (Ret.)
Special Master